

**UNITED STATES BANKRUPTCY COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	<b>BANKRUPTCY CASE NO.</b>
	§	
<b>JET PRESSURE WASHERS, LTD.,</b>	§	<b>11-32090-H3-11</b>
	§	
<b>DEBTOR</b>	§	<b>Chapter 11</b>

**EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL**

COMES NOW JET PRESSURE WASHSERS, LTD., Debtor, and files this its Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.
2. Commercial Credit Group asserts a security interest in all of Debtor's accounts receivable and inventory to secure indebtedness owed it by Debtor.
3. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.
4. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its employees, insurance, utilities, and to pay for necessary repairs, maintenance and office expenses.
5. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.
6. The cash collateral at issue herein is in effect the funds collected from normal business operations generated monthly, with an average collateral value of approximately

\$30,000.00 per month. Debtor is requesting authorization for use of cash collateral for 14 days in the amount of \$15,000.00. Obviously, Debtor consents to giving Commercial Credit Group a replacement lien on all of its security.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure  
MARGARET M. MCCLURE  
State Bar No. 00787997  
2 Houston Center  
909 Fannin, Suite 3810  
Houston, Texas 77010  
(713) 659-1333  
(713) 658-0334 (fax)  
[margaret@mmmccclurelaw.com](mailto:margaret@mmmccclurelaw.com) (e-mail)

ATTORNEY FOR DEBTOR

**JET PRESSURE WASHERS, LTD**  
**14 and 30 DAY BUDGET**  
**CASH BASIS**

	Day 1-14	Day 15-30	Total
<b>Rental Income</b>	\$ 15,000	15,000	30,000
<b>Cost of Goods Sold</b>			
Parts & Supplies	1,250	3,500	4,750
<b>Total Cost of Goods Sold</b>	\$ 1,250	3,500	4,750
<b>Gross Profit</b>	\$ 13,750	11,500	25,250
<b>Operating Expenses</b>			
Auto Expenses - Registration	-	78	78
Office Expenses	-	250	250
Payroll Taxes	658	658	1,317
Rent - Building	3,500	-	3,500
Repairs	250	250	500
Sales Tax	-	1,200	1,200
Telephone	308	-	308
Utilities	260	-	260
Wages	8,606	8,606	17,212
<b>Total Operating Expenses</b>	\$ 13,582	11,042	24,625
<b>Net Income</b>	\$ 168	458	625

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically mailed or mailed by first class mail, postage prepaid, this 4th day of March, 2011 to the following:

Mr. Judy A. Robbins  
U.S. Trustee  
515 Rusk, 3rd Floor  
Houston, Texas 77002

Mr. Jerald Templeton  
Jet Pressure Washers, Ltd.  
P.O. Box 1002  
La Porte, Texas 77572-1002

Mr. John Mayer  
Ross, Banks, May, Cron & Cavin, P.C.  
2 Riverway, Suite 700  
Houston, Texas 77056-1918

Via Facsimiles: 713-623-6014

**ATTORNEY FOR COMMERCIAL CREDIT GROUP**

Ms. Laura Huskey  
Texas Citizens Bank  
P.O. Box 7350  
Pasadena, Texas 77508-7350

Via Facsimile: 713-948-9331

/s/ Margaret M. McClure  
MARGARET M. MCCLURE